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Attorneys for Defendants State of Oregon, Oregon State Police and Governor Kate Brown

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

D. JEANETTE FINICUM; THARA
TENNEY; TIERRA COLLIER; ROBERT
FINICUM; TAWNY CRANE; ARIANNA
BROWN; BRITTNEY BECK; MITCH
FINICUM; THOMAS KINNE; CHALLICE
FINCH; JAMES FINICUM; DANIELLE
FINICUM; TEAN FINICUM; and the
ESTATE OF ROBERT LAVOY FINICUM,

Plaintiffs,

v.

UNITED STATES OF AMERICA;
FEDERAL BUREAU OF INVESTIGATION;
BUREAU OF LAND MANAGEMENT;
DANIEL P. LOVE; SALVATORE LAURO;
GREG T. BRETZING; W. JOSEPH

Case No. 2:18-cv-00160-MO

STATE DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION TO EXTEND TIME
TO FILE AMENDED COMPLAINT
[PURSUANT TO DOC. NO. 180]

ASTARITA; SPECIAL AGENT BM;
MICHAEL FERRARI; STATE OF OREGON;
OREGON STATE POLICE; TRAVIS
HAMPTON; TROOPER 1 TROOPER 2;
KATHERINE BROWN; HARNEY
COUNTY; DAVID M. WARD; STEVEN E.
GRASTY; and the CENTER FOR
BIOLOGICAL DIVERSITY,

Defendants.

On September 1, 2021, counsel for the remaining defendants received an email from plaintiffs' counsel requesting that defendants agree to plaintiffs' **eleventh** request for additional time. Counsel provided no reason the delay was needed and specified that plaintiffs wanted a 45-day extension. The state defendants counsel and the county's counsel both refused to agree. On September 9, 2021, plaintiffs' counsel filed a contested motion for a 30-day extension, which, for the first time, explained the reasons plaintiffs wanted an extension of time.

Under the circumstances stated in the motion, the state defendants agree that an extension of time no longer than thirty days is appropriate.

DATED September 14, 2021.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ James S. Smith

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